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June 3, 2016

VIA ECF

The Hon. Ronnie Abrams
United States Magistrate Judge
U.S. District Court for the Southern District of New York
40 Foley Square
New York, NY 10007

***Re: Jeanette Fernandez v. Mizu For Hair New York, LLC, d/b/a Mizu For Hair,
and Mizu For Hair LLC, d/b/a Mizu For Hair, 15 CV 00523 (RA)(RLE)***

Dear Judge Abrams:

We represent Plaintiff Jeanette Fernandez in the above-referenced employment matter. We write on behalf of the Parties pursuant to the Court's Order of May 23, 2016 to respectfully inform the Court of the status of the case in advance of the post-discovery conference scheduled before Your Honor on June 10, 2016 at 10:00 a.m..

1. Discovery.

- a. Fact Discovery.** Defendants completed Plaintiff's deposition on June 1, 2016. No other fact discovery by either Party remains outstanding.
- b. Expert Witnesses.** As stated below, the Parties have agreed to enter into mediation for the purpose of settling the litigation. Therefore, the Parties have filed a letter motion to the attention of Magistrate Judge Ronald E. Ellis respectfully requesting that the Court adjourn the Court's deadline requiring Defendants to identify, on or before today, any expert witness on which they intend to rely. The requested adjournment would be for a period of 30 days following any failure by the Parties to mediate the litigation to conclusion, with other expert witness discovery deadlines extended accordingly.


- 2. Mediation.** The Parties have agreed to mediate the case and have begun consideration of prospective mediators. The Parties' hope is that on or before the date of the post-discovery conference, they will have chosen a mediator and have scheduled or tentatively scheduled a date for such mediation.

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3. Dispositive Motions. Failing settlement, neither Party at this time anticipates filing a dispositive motion, but both reserve rights to do so.

Thank you for your time and attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Walker G. Harman, Jr.", written in a cursive style.

Walker G. Harman, Jr.

cc: Susan Roberts (via ECF)
Lori A. Jablczynski (via ECF)
Wendy Mellk (via ECF)